

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

IN RE:)	CHAPTER 7
)	
CASSANDRA JOHNSON LANDRY)	CASE NO. 18-55697-LRC
)	
Debtor.)	
-----)	
)	
CASSANDRA JOHNSON LANDRY,)	
)	
Movant,)	
)	-----
vs.)	
)	CONTESTED MATTER
RESURGENT CAPITAL SERVICES,)	
LP AS SERVICER FOR CACH,)	
LLC,)	
)	
Respondents.)	
)	
)	
)	
)	

**RESPONSE OF RESURGENT CAPITAL SERVICES, LP AS SERVICER FOR CACH,
LLC TO DEBTOR'S OBJECTION (Doc 373) TO PROOF OF CLAIM NO. 14 AND
REQUEST FOR HEARING**

COMES NOW RESURGENT CAPITAL SERVICES, LP AS SERVICER FOR CACH, LLC, (hereinafter referred to as "CACH, LLC") and files this Response to the Debtor's Objection to Proof of Claim Number 14, showing this Honorable Court as follows:

FIRST DEFENSE

The objection of the Debtor to Proof of Claim #14 must be

denied for the reasons set for the Order of the Court entered in this case on 02/03/2021 (Doc 337). See also In re Trusted Net Media Holdings, LLC 334 BR 470 (USBC ND GA Mullins, J).

SECOND DEFENSE

CACH, LLC shows that the basis for the Proof of Claim #14 is the Debtor's personal guaranty of a business operated by the debtor. The supporting documents and payment history have been attached the proof of claim as amended.

THIRD DEFENSE

In response to the allegations of the Debtors' Objection, CACH, LLC admits only that CACH, LLC filed proof of claim #14 as amended. The rest and remaining allegations of the Debtor's objection are denied.

GENERAL DENIAL

Any allegations in the Debtor's Objection not specifically addressed in this response are denied.

WHEREFORE CACH, LLC prays that

- i. The court schedule a hearing on the Objection.
- ii. The court deny the objection and allow the claim of CACH, LLC as filed.

iii. The court grant such other and further relief as is just and proper.

This 14th day of June, 2021.

Respectfully submitted,

LEVINE & BLOCK, LLC

BY: /s/ Ronald A. Levine
Ronald A. Levine, Esq.
[GA Bar No. 448736]
ATTORNEYS FOR CACH, LLC

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Atlanta, Georgia 30342
(404) 231-4567

BANKRUPTCY NO.18-55697-LRC
CHAPTER 13
JUDGE LISA RITCHEY CRAIG

CERTIFICATE OF SERVICE

I, Ronald A. Levine, Esq. of Levine & Block, LLC., P.O. Box 422148, Atlanta, Georgia 30342 certify:

That I am, and at all times hereinafter mentioned, was more than 18 years of age:

That on the 14th day of June, 2021, I served a copy of the within and foregoing RESPONSE TO DEBTOR'S OBJECTION TO PROOF OF CLAIM #14 AND REQUEST FOR HEARING filed in this bankruptcy matter on:

CASSANDRA JOHNSON LANDRY

the respondent(s) in this bankruptcy matter by regular first class mail addressed to the said respondent(s) at:

Cassandra Johnson Landry
P.O. Box 1275
Grayson, Georgia 30017

And the following parties were served electronically via the court's ECF Noticing System:

upon Trustee-in-Bankruptcy:

S. Gregory Hays, Esq.
Hays Financial Consulting, LLC
Suite 555
2964 Peachtree Road
Atlanta, GA 30305

I CERTIFY UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT.

Executed on 06/14/2021
(Date)

By: /s/ Ronald A. Levine
Ronald A. Levine, Esq.
(Ga. Bar No. 448736)